



## FEMA Requirement B4: Repetitive Loss Properties

### Does the Plan address NFIP insured structures within each jurisdiction that have been repetitively damaged by floods?

Local Mitigation Plan Review Guide, FEMA, 2011, page 21

This “Good Practice” document is intended to help plan developers understand the FEMA requirement to describe the types and numbers of repetitive loss properties located within designated flood hazard areas.

Such information can identify areas with the most active claim history and high vulnerability to flooding. The community can use this knowledge in developing actions to mitigate future damages, and toward meeting Requirements B3 and C4.

### Common Reasons Why FEMA Returns Plans for B4 Revisions

1. No mention is made of repetitive loss properties within the jurisdiction’s flood hazard areas, or whether the community has no such properties.
2. No description is provided for each type of repetitive loss property that lays within the designated flood hazard areas or the plan contains confidential information related to specific properties (see text box to the right).
3. The number of repetitive loss properties is not given or is obviously in error.

**Tip:** Take care to use the most current data and update the repetitive loss figures used in past plans.

**Tip:** For information, contact your state’s coordinating office for the National Flood Insurance Program

#### The Privacy Act of 1974

Hazard mitigation plans are occasionally submitted improperly with confidential policy holder or assistance recipient information.

If such information is included, the plan cannot be approved until the private information is removed. (See last paragraph of Regulatory Guidance at conclusion of this guide.)

**Note:** Maps showing *general* areas of claim payments *can* be included within a hazard mitigation plan.

(NFIP). Frequently, this office is within a state Floodplain Management Program.

**Note:** Unique vulnerabilities might be disclosed by identifying and examining the separate totals for every repetitive loss property type, including commercial, industrial, and institutional.

4. The total number of repetitive loss properties does not equal the subtotals given for each identified type of repetitive loss property. This may indicate either other property types are affected, or that the repetitive loss properties are *outside* designated flood hazard areas.

**Tip:** Explain if any of these repetitive loss properties lay outside designated flood hazard areas. If so, this may also indicate improvements should be considered on future flood hazard maps.

**Note:** If repetitive loss sites are outside designated flood hazard areas, this information may be useful in identifying additional mitigation actions, and in meeting Requirements B1 and B3.

5. Occasionally, a plan will confuse the federally-defined repetitive loss properties with other frequently damaged sites for which no NFIP claims were filed.

**Tip:** Include the federal definition of repetitive loss property and severe repetitive loss property within the plan and identify properties falling under the definition. Other properties may be included in the numbers for consideration in the mitigation strategy, but differentiate them as locally-identified structures.

**Note:** If non-insured areas are frequently flood damaged, then consider those in developing mitigation actions and in addressing Requirements for B1, B3 and C4. This may also show the need for potential revisions to existing flood hazard maps.

## Plans Demonstrating Good Practice for Requirement B4

This section provides two abstracts illustrating good practices in meeting this requirement. Revere, MA as Example 1 explains the types of repetitive loss properties found within the City and estimates the numbers within designated flood hazard areas. Example 2, Guilford, VT, clearly states the town has no repetitive losses. Practices going “Beyond Minimum Requirements” are also noted.

Other approaches are possible and should fit the particular circumstances of the community, so don’t be limited by these examples.

**Example 1: *City of Revere, MA Hazard Mitigation Plan (2015)*****Why This Plan Demonstrates Good Practice**

1. The types of repetitive loss properties located within the City's flood hazard areas are identified as single family and multi-family residential housing along with commercial or industrial structures.

**Beyond Minimum Requirements:** The plan defines repetitive loss.

**Beyond Minimum Requirements:** Subcategories of residential properties are identified (single and multi-family).

2. The total number of repetitive loss properties located within flood hazard areas is stated while noting when the data was obtained (third paragraph of abstract).

**Beyond Minimum Requirements:** The plan provides the total number of repetitive loss properties throughout the entire community. In addition, an increase is noted between the 2005 plan and 2014 figures.

**Beyond Minimum Requirements:** The plan provides individual numbers for several property types, for locations inside flood hazard areas and within locally-identified areas of flooding (not a flood hazard zone).

**Beyond Minimum Requirements:** The numbers of repetitive loss properties are further broken down by category of FEMA flood zone, identified neighborhood, street, or City infrastructure. No specific properties are identified, so privacy is safeguarded.

See Abstract on following page.

## Abstract pages 22-23

***City of Revere, MA Hazard Mitigation Plan (2015)***Repetitive Loss Structures

As of August 2014 there are 293 repetitive loss structures in Revere, an increase of 44 from the 249 structures identified in the 2005 plan. As defined by the Community Rating System (CRS) of the National Flood Insurance Program (NFIP), a repetitive loss property is any property which the NFIP has paid two or more flood claims of \$1,000 or more in any given 10-year period since 1978. For more information on repetitive losses see

<http://www.fema.gov/business/nfip/replps.shtm>.

[FEMA note: This web address is no longer valid. General information on repetitive loss properties can be found at [https://www.fema.gov/txt/rebuild/repetitive\\_loss\\_faqs.txt](https://www.fema.gov/txt/rebuild/repetitive_loss_faqs.txt) or at [www.FloodSmart.gov](http://www.FloodSmart.gov)]

Revere's 293 repetitive loss properties consist of 169 single-family residential structures, 100 2-4 family residential structures, five commercial, industrial, or institutional structures, 8 condominiums, and eleven other-types of residential structures.

A total of 270 of these properties are located within one of the FEMA flood zones (A, VE, or 0.2%), of which 164 are single family residences, 103 are multifamily residences, and three are commercial or industrial structures.

Within the locally-identified areas of flooding there are 25 structures, of which 16 are single family residences, seven are multi-family residences, and two are commercial or industrial structures. (see Table 8 below).

Source: FEMA Data provided by MA DCR, August 2014

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<b>Table 8</b> <b>Repetitive Loss Properties Summary as of August 2014</b>				
<b>Flood Zone</b>	<b>Single Family Residential Structures</b>	<b>Multi-Family Residential Structures</b>	<b>Commercial, Industrial, or Institutional Structures</b>	<b>Total Repetitive Loss Properties</b>
FEMA Zone A	127	67	2	196
FEMA Zone VE	0	0	0	0
FEMA .2% annual chance	37	36	1	74
<b>Total: FEMA Flood Zones</b>	<b>164</b>	<b>103</b>	<b>3</b>	<b>270</b>
Asti Avenue Neighborhood	1	0	0	1
Elliot Circle	0	0	0	0
Pump station at Martin Street	0	0	0	0
Pump station at Oak Island	0	0	0	0
Point of Pines- Seawall	1	0	0	1
Cary Circle to Alden Avenue	0	0	0	0
Rice Avenue near Yacht Club	7	2	0	9
Revere Beach	4	3	2	9
Washburn Avenue Drainage Outfall	0	0	0	0
Belle Isle Avenue Neighborhood	0	0	0	0
Pearl Avenue	3	2	0	5
Winthrop Parkway Neighborhood	0	0	0	0
<b>Total: Locally Identified Areas of Flooding</b>	<b>16</b>	<b>7</b>	<b>2</b>	<b>25</b>

Source: FEMA Data provided by MA DCR, August 2014

**Example 2: Town of Guilford (VT) Local Hazard Mitigation Plan (2015)**

## No Repetitive Loss Properties

**Why This Plan Demonstrates Good Practice**

1. The plan clearly states the town has no repetitive loss properties.
2. **Beyond Minimum Requirements:** Repetitive Loss and Severe Repetitive Loss properties are defined using the official NFIP definition. The source is cited along with a related website address.
3. **Beyond Minimum Requirements:** The source of the repetitive loss data is cited and the website address given for downloading a document with the information.

See Abstract below.

**Abstract from page 24*****Town of Guilford (VT) Local Hazard Mitigation Plan (2015)*****Repetitive Loss Structures**

According to FloodReady.Vermont.gov, Guilford has no repetitive loss claims.<sup>25</sup> A Repetitive loss structure is an NFIP-insured structure that has had at least 2 paid flood losses of more than \$1,000 each in any 10-year period since 1978.<sup>26</sup> Severe repetitive loss (SRL) structures are NFIP-insured buildings that, on the basis of paid flood losses since 1978, meet either of the loss criteria described in the SRL section. SRL properties with policy effective dates of January 1, 2007 and later will be afforded coverage (new business or renewal) only through the NFIP Servicing Agent's Special Direct Facility (SDF) so that they can be considered for possible mitigation activities. An SRL property is defined as a residential property that is covered under an NFIP flood insurance policy and:

- (a) That has at least four NFIP claim payments (including building and contents) over \$5,000 each, and the cumulative amount of such claims payments exceeds \$20,000; or
- (b) For which at least two separate claims payments (building payments only) have been made with the cumulative amount of the building portion of such claims exceeding the market value of the building.
- (c) For both (a) and (b) above, at least two of the referenced claims must have occurred within any ten-year period, and must be greater than 10 days apart.

<sup>25</sup> Report listing repetitive losses is available here:

<<http://floodready.vermont.gov/sites/floodready/files/documents/RLReport6.17.14.pdf>>

<sup>26</sup> <https://www.fema.gov/national-flood-insurance-program/definitions>

## B4 Regulatory Guidance

### Abstracts from *Code of Federal Regulations and Local Mitigation Plan Review Guide, October 1, 2011*

#### Element B4 Regulation [§201.6(c)(2)(ii)] (page 18)

[The risk assessment shall include a] description of the jurisdiction's vulnerability to the hazards described in paragraph (c)(2)(i) of this section. This description shall include an overall summary of each hazard and its impact on the community. All plans approved after October 1, 2008 must also address NFIP insured structures that have been repetitively damaged by floods.

#### Element Intent (page 21)

To inform hazard mitigation actions for properties that have suffered repetitive damage due to flooding, particularly problem areas that may not be apparent on floodplain maps. Information on repetitive loss properties helps inform FEMA hazard mitigation assistance programs under the National Flood Insurance Act.

#### Element Requirements (page 21)

- a. The plan **must** describe the types (residential, commercial, institutional, etc.) and estimate the numbers of repetitive loss properties located in identified flood hazard areas.

Repetitive loss properties are those for which two or more losses of at least \$1,000 each have been paid under the National Flood Insurance Program (NFIP) within any 10-year period since 1978.

Severe repetitive loss properties are residential properties that have at least four NFIP payments over \$5,000 each and the cumulative amount of such claims exceeds \$20,000, or at least two separate claims payments with the cumulative amount exceeding the market value of the building.

Use of flood insurance claim and disaster assistance information is subject to The Privacy Act of 1974, as amended, which prohibits public release of the names of policy holders or recipients of financial assistance and the amount of the claim payment or assistance. However, maps showing general areas where claims have been paid can be made public. If a plan includes the names of policy holders or recipients of financial assistance and the amount of the claim payment or assistance, the plan cannot be approved until this Privacy Act covered information is removed from the plan.

***Check Out These Additional Aids***

Local Mitigation Plan Review Guide, October 2011 (pages 18 and 21)  
<http://www.fema.gov/media-library/assets/documents/23194>

Local Mitigation Planning Handbook, March 2013 (page 5-16)  
<http://www.fema.gov/media-library/assets/documents/31598>